

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

<u>BARCO, INC. and BARCO NV,</u>	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	Civil Action No. 2:23-cv-00521-JRG-RSP
	§	
YEALINK (USA) NETWORK	§	
TECHNOLOGY CO., LTD., and	§	
YEALINK NETWORK	§	
TECHNOLOGY CO., LTD.	§	JURY TRIAL DEMANDED
	§	
<u>Defendants.</u>	§	

**DECLARATION OF FORREST GOTHIA IN SUPPORT OF
DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, Forrest Gothia, hereby declare as follows:

1. I am an associate at the firm of Dentons US LLP and counsel for Defendants Yealink (USA) Network Technology Co., LTD and Yealink Technology Co., LTD ("Yealink"). I have personal knowledge of the facts set forth in this Declaration and if called upon as a witness, I could and would testify to such facts under oath.
2. Attached as **Exhibit A** is a true and correct copy of the Cease and Desist Letter, dated May 17, 2023 (Barco_0000001- BARCO_0000041).
3. Attached as **Exhibit B** is a true and correct copy of the Cease and Desist Letter, dated August 23, 2023 (Barco_00052328).
4. Attached as **Exhibit C** is at true and correct copy of Plaintiffs' Disclosure of Asserted Claims and Infringement Contentions, dated March 11, 2024.
5. Attached as **Exhibit D** is a true and correct copy of Plaintiffs' First Amended Disclosure of Asserted Claim and Infringement Contentions, dated December 11, 2024.

6. Attached as **Exhibit E** is a true and correct copy of Plaintiffs' Second Amended Disclosure of Asserted Claims and Infringement Contentions, dated December 16, 2024.

7. Attached as **Exhibit F** is a true and correct copy of Plaintiffs' Responses and Objections to Defendants' Second Set of Interrogatories (Nos. 9-16), dated January 27, 2025.

8. Attached as **Exhibit G** is a true and correct copy of Barco's patent "Download List (Updated 2024-07-12)" (BARCO_0053943-BARCO_0053951).

9. Attached as **Exhibit H** is a true and correct copy of excerpts from the Deposition of Erwin Six, dated April 25, 2025.

10. Attached as **Exhibit I** is a true and correct copy of Barco's patent marking webpage (BARCO_0053974- BARCO_0053976).

11. Attached as **Exhibit J** is a true and correct copy of Barco's patent "Download list (Updated 2021-01-19)" (BARCO_0053969-BARCO_0053973).

12. Attached as **Exhibit K** is a true and correct copy of Barco's patent "Download list (Updated 2021-06-29)" (BARCO_0053964-BARCO_0053968).

13. Attached as **Exhibit L** is a true and correct copy of Barco's patent "Download list (Updated 2023-10-19)" (BARCO_0053958-BARCO_0053963).

14. Attached as **Exhibit M** is a true and correct copy of the Declaration of Mina Ching and WayBack Machine screen captures (YEALINK_0014418-YEALINK_0014460).

15. Attached as **Exhibit N** is a true and correct copy of excerpts from the Deposition of William B. Scally, dated May 23, 2025.

16. Attached as **Exhibit O** is a true and correct copy of a picture of Barco's ClickShare Button (YEALINK_00014474).

17. Attached as **Exhibit P** is a true and correct copy of a picture of Barco's ClickShare Button (YEALINK_00014475).

18. Attached as **Exhibit Q** is a true and correct copy of a picture of Barco's ClickShare Button's package (YEALINK_00014468).

19. Attached as **Exhibit R** is a true and correct copy of Barco's webpage titled "ClickShare new button Base Unit dependency" (YEALINK_00014326).

20. Attached as **Exhibit S** is a true and correct copy of ClickShare CX-50 Gen2 Installation Manual (BARCO_0053357-BARCO_0053460).

21. Attached as **Exhibit T** is a true and correct copy of the Expert Report of William B. Scally, CFA, dated April 28, 2025.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 17, 2025 in Dallas, Texas.

/s/ Forrest Gothia
Forrest Gothia